

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

MARY HOLMES, L.V., and EMPOWER
MISSOURI,

Case No. 2:22-cv-04026-MDH

Plaintiffs,

-against-

ROBERT KNODELL, in his official
capacity as Acting Director of the
Missouri Department of Social Services,

Defendant.

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Defendant Robert Knodell, acting in his official capacity as Director of the Missouri Department of Social Services, by and through the undersigned counsel, hereby move this Court, pursuant to Fed. R.Civ.P. 56(b), for an Order dismissing Plaintiff's Complaint, as there are no genuine issues of material fact and the Defendant is entitled to judgment as a matter of law.

Defendants have filed their Statement of Uncontroverted Material Facts and Memorandum in Support of their Motion for Summary Judgment contemporaneously herewith and incorporate the same by reference.

WHEREFORE, for the foregoing reasons, Defendant Robert Knodell, acting in his official capacity as Director of the Missouri Department of Social Services respectfully requests this Court grant summary judgment in his favor, and for such other and further relief as this Court deems just and proper.

Respectfully Submitted,

ANDREW BAILEY

Attorney General

/s/ Hardin T. Haynes

Jason K. Lewis, #66725

*Chief Counsel for Governmental
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was forwarded to all attorneys of record via the Court's electronic filing system this 22nd day of September, 2023

/s/ Hardin T. Haynes
Attorney for Defendant